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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
FORT WAYNE DIVISION

RYAN KLAASSEN, JAIME CARINI,)
D.J.B., by and through his)
next friend and father,)
DANIEL G. BAUMGARTNER,)
ASHLEE MORRIS, SETH CROWDER,)
MACEY POLICKA, MARGARET ROTH,)
and NATALIE SPERAZZA,)

)
Plaintiffs,)

) CASE NO.
-vs-) 1:21-cv-00238
)

THE TRUSTEES OF INDIANA)
UNIVERSITY,)

)
Defendant.)

DEPOSITION OF D.J.B.
June 29, 2021

Remote oral deposition of D.J.B., commencing
at 4:00 p.m. Central Standard Time, on the above
date, before CORINNE T. MARUT, C.S.R. No. 84-1968,
Registered Professional Reporter, Certified
Realtime Reporter and Notary Public.

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1 APPEARANCES
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19 ALSO PRESENT:
20 DANIEL BAUMGARTNER
21 LISA BAUMGARTNER

22 REPORTED BY: CORINNE T. MARUT, C.S.R. No. 84-1968

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1 THE REPORTER: All parties to this deposition
2 are appearing remotely and have agreed to the
3 witness being sworn in remotely.

4 Due to the nature of remote reporting,
5 please pause briefly before speaking to ensure all
6 parties are heard completely.

7 Counsel will be noted on the
8 stenographic record.

9 Counsel, do you so stipulate to the
10 remote swearing in of the witness?

11 MS. SIEBERT: We do. Plaintiff's counsel
12 does.

13 MS. RICCHIUTO: We do.
14 (WHEREUPON, the witness was duly
15 sworn.)

16 MS. RICCHIUTO: Thank you.

17 D.J.B.,
18 called as a witness herein, having been first duly
19 sworn, was examined and testified as follows:

20 EXAMINATION

21 BY MS. RICCHIUTO:

22 Q. Hi, Daniel. My name is Anne Ricchiuto.
23 I'm a lawyer for Indiana University that's
24 defending them in this lawsuit, and I'm going to be

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1 the one taking your deposition today.

2 The only thing that I want to make sure
3 to add to the reporter's kind of technical comments
4 is that if we have any issues that arise, if you
5 lose us or we lose you or Melena loses us, we will
6 all let one another know and try to get back
7 together as quickly and as smoothly as we can.

8 As the reporter mentioned, your lawyer
9 might want to interpose some objections to some of
10 my questions and if she does that, that's fine.
11 You will still need to answer the question unless
12 she tells you not to.

13 Have you ever had your deposition taken
14 before?

15 A. I have not, no.

16 Q. Okay. So, just briefly about the
17 process, and this is -- it's an odd process and
18 it's especially odd to do kind of on the computer
19 from your house.

20 But you understand that you're under
21 oath to testify truthfully today to the best of
22 your ability, correct?

23 A. Yes.

24 Q. Okay. And I'm going to be posing

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1 questions to you, and I'm interested in your
2 answers to those questions. So, I know that it's a
3 little bit confusing since your folks are with you,
4 but your answers are the ones that I'm interested
5 in.

6 Do you have any notes or documents with
7 you?

8 A. Yes.

9 Q. Okay. Are those notes that you created
10 or that someone created for you?

11 A. My parents helped me with them.

12 Q. Okay.

13 MS. RICCHIUTO: Melena, we'll want to request
14 a copy of those notes.

15 MS. SIEBERT: Okay.

16 MS. RICCHIUTO: Okay.

17 BY MS. RICCHIUTO:

18 Q. If you make any other notes, Daniel,
19 while we are talking today, I just need to let you
20 know -- I need you to let me know so that your
21 lawyer can give those to me as well.

22 I'm going to try to ask clear questions
23 that make sense for you to answer. If you don't
24 understand my question, I want you to tell me. If

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1 you answer the question, I'm going to assume that
2 you understood it. Can we agree on that?

3 A. Yes.

4 Q. Okay. And then the other thing that's
5 really hard is we know that we have the reporter
6 and she can only take down things that she can
7 hear. So, we have to do a good job of making sure
8 that we're answering audibly, and I can help you or
9 Melena can help you, you know. Shrugs or uh-uhs or
10 um-hmms, the things that we all say naturally just
11 don't transcribe very well. So, we'll try to work
12 as a team to make sure that we get answers on the
13 record that we can use going forward.

14 Now, I understand that you and your dad
15 have the same first and last name, is that right?

16 A. That is correct.

17 Q. Okay. And your lawyer and I I think
18 have agreed that I can call you Daniel during this
19 deposition. Is that okay with you? Are you
20 comfortable with that?

21 A. That's all right, yeah.

22 Q. Okay. Will you please state your name
23 for the record.

24 A. D.J.B.

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1 Q. How old are you, Daniel?

2 A. I'm 17.

3 Q. When do you turn 18?

4 A. July 11.

5 Q. What is your understanding of your
6 involvement in this lawsuit?

7 A. To my understanding, I am -- I have been
8 given a religious exemption, and I'm looking to get
9 an exemption for mask and COVID testing.

10 Q. Okay. Who is the party to this lawsuit
11 as far as you know? Is it you or your dad?

12 A. My father.

13 Q. Okay. How did you become aware that
14 there was going to be a lawsuit suing Indiana
15 University?

16 A. My parents informed me after contacting
17 the law firm.

18 Q. Did they -- do you know, did they
19 contact Mr. Bopp's firm specifically?

20 A. They did, yes.

21 Q. Okay. Whose idea was it to participate
22 in the lawsuit? Was that something that you wanted
23 to do or something that your parents want to do?

24 A. We all agreed on it.

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<p>1 Q. Okay. I want to show you a document, if 2 I can pull it off, Daniel. Let's see. This will 3 be our first test.</p> <p>4 MS. RICCHIUTO: Do you have -- do they have, 5 Melena, the exhibit portal up?</p> <p>6 MS. SIEBERT: They were sent a link.</p> <p>7 Do you have that up, Daniel, the link to 8 the exhibit portal that I sent to you all?</p> <p>9 THE WITNESS: I do not have it up now, no.</p> <p>10 MS. SIEBERT: If you could just --</p> <p>11 MS. RICCHIUTO: No problem.</p> <p>12 MS. SIEBERT: -- get that up. We can give you 13 a couple minutes. That's no problem.</p> <p>14 Sorry to interrupt, Anne.</p> <p>15 MS. RICCHIUTO: No, that's no problem.</p> <p>16 THE WITNESS: We got it up.</p> <p>17 (WHEREUPON, D.J.B. Deposition 18 Exhibit No. 1 was marked for 19 identification: Signed 20 Verification.)</p> <p>21 BY MS. RICCHIUTO:</p> <p>22 Q. Okay. So, do you see a verification 23 page that's got kind of some blue writing across 24 the top?</p>	<p>1 A. Yes.</p> <p>2 Q. Okay, great.</p> <p>3 MS. RICCHIUTO: Melena, do you have that too?</p> <p>4 Are you able to get that?</p> <p>5 MS. SIEBERT: I do.</p> <p>6 BY MS. RICCHIUTO:</p> <p>7 Q. So now we are all looking at the same 8 document.</p> <p>9 Is this a document that you've seen 10 before, Daniel?</p> <p>11 A. I don't know.</p> <p>12 Q. Okay. Is that your handwriting on it?</p> <p>13 There is a printed name at the top and a signature 14 at the bottom. Is that your handwriting and 15 signature or is that your dad?</p> <p>16 A. I'm not sure. It looks like my 17 father's.</p> <p>18 Q. Okay. That's fine. Do you have any 19 understanding of what this verification does or 20 means? This is something that was filed with the 21 court in this case.</p> <p>22 A. Yes.</p> <p>23 Q. You do have an understanding of what it 24 means?</p>
<p style="text-align: center;">Page 11</p> <p>1 A. Yes.</p> <p>2 Q. Okay. What does this verification 3 page mean?</p> <p>4 A. That I have to answer to the best of my 5 knowledge and understanding.</p> <p>6 Q. Okay. This is a document that was 7 filed -- I'll -- this is not meant to be -- this is 8 not meant to be a quiz, so I'll just give you some 9 context, Daniel.</p> <p>10 This is a document that was filed with 11 the Complaint, which is the document that kind of 12 starts the lawsuit on behalf of you and some others 13 against IU. And people who are filing a lawsuit 14 that's called verified, they typically sign a 15 document like this to say that the things that are 16 about them in the lawsuit are true.</p> <p>17 And, so, what I think this document does 18 is say that your dad has verified that the 19 information about you that's in the lawsuit that 20 we'll look at is all true. But it sounds like at 21 least this piece of paper, what didn't -- isn't 22 necessarily something that you were involved with. 23 Is that right?</p> <p>24 A. That is correct.</p>	<p style="text-align: center;">Page 12</p> <p>1 Q. Yeah. And that's just fine. I'm 2 just -- today is just a day for me to get some 3 information. So, we're -- that's all I'm trying to 4 do is just understand.</p> <p>5 Have you read the Complaint in this 6 case, the actual lawsuit document?</p> <p>7 A. I have.</p> <p>8 Q. Okay. Have you -- did you review all 9 the exhibits to it?</p> <p>10 A. I did.</p> <p>11 Q. Okay. Do you know, if I asked you if 12 you agree if everything in the Complaint is 13 accurate, would you be able to answer that?</p> <p>14 A. Yes.</p> <p>15 Q. You agree that everything in the 16 Complaint is accurate?</p> <p>17 A. I do.</p> <p>18 Q. And is your answer to that question 19 limited to information about you or you agree that 20 everything in the whole 254 paragraphs is correct?</p> <p>21 A. I believe that it is all correct.</p> <p>22 Q. Okay. You are an incoming freshman, is 23 that right?</p> <p>24 A. That is correct.</p>

<p style="text-align: center;">Page 13</p> <p>1 Q. Okay. Have you registered for your 2 classes yet?</p> <p>3 A. I have, yes.</p> <p>4 Q. What are you going to be studying?</p> <p>5 A. I was planning on studying business.</p> <p>6 Q. Okay. Do you have a dorm assignment or 7 living arrangements organized yet?</p> <p>8 A. Nothing was assigned yet.</p> <p>9 Q. Okay. Daniel, have you been vaccinated 10 against COVID-19?</p> <p>11 A. I have not.</p> <p>12 Q. Whose decision was it for you not to be 13 vaccinated against COVID-19?</p> <p>14 A. It was my own.</p> <p>15 Q. Do you have plans to get vaccinated in a 16 couple weeks when you turn 18 or thereafter?</p> <p>17 A. I have no plans on getting vaccinated.</p> <p>18 Q. Okay. I'm going to show you one other 19 document if I can. I think if you refresh that 20 website, you will see one more document pull up.</p> <p>21 (WHEREUPON, D.J.B. Deposition 22 Exhibit No. 2 was marked for 23 identification: Verified Complaint 24 for Declaratory and Injunctive</p>	<p style="text-align: center;">Page 14</p> <p>1 Relief.)</p> <p>2 BY MS. RICCHIUTO:</p> <p>3 Q. And do you see at the top where there is 4 the numbers like page 1 of 55, kind of in the 5 left-hand corner?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. We're going to be going to 8 page 42. So, you can either type 42 in that box or 9 you can scroll down to page 42. But we're looking 10 for the allegations starting with the one numbered 11 196.</p> <p>12 A. I got it.</p> <p>13 Q. Okay. Are we together?</p> <p>14 MS. RICCHIUTO: Melena, are you good?</p> <p>15 MS. SIEBERT: I am.</p> <p>16 MS. RICCHIUTO: Okay, great.</p> <p>17 BY MS. RICCHIUTO:</p> <p>18 Q. These paragraphs 196 through 200 of the 19 Complaint that's been marked as Exhibit 2, and you 20 can -- you're welcome to look at any part of the 21 document. This is the part I'm going to focus on. 22 But this is the lawsuit that was filed by your 23 lawyers on your behalf, yours and others.</p> <p>24 Paragraphs 196 through 200 are</p>
<p style="text-align: center;">Page 15</p> <p>1 specifically about you. You're referenced as 2 Mr. D.J.B. or Plaintiff D.J.B. in this document.</p> <p>3 Have you seen these specific paragraphs 4 before?</p> <p>5 A. I have, yes.</p> <p>6 Q. Okay. And are they accurate?</p> <p>7 A. They are accurate, yes.</p> <p>8 Q. Okay. And one of the things that they 9 say in paragraph 196 is that you sought and were 10 granted a religious exemption to the vaccine, 11 right?</p> <p>12 A. That is correct.</p> <p>13 Q. Do you see that?</p> <p>14 A. That is correct, yes.</p> <p>15 Q. Very briefly, can you just explain the 16 basis of your religious objection to the vaccine.</p> <p>17 MS. SIEBERT: Anne, I'm going to object to 18 this line of questioning as any kind of State 19 involvement into the basis for religious exemption 20 would be unconstitutional.</p> <p>21 Daniel, you may go ahead and answer.</p> <p>22 BY THE WITNESS:</p> <p>23 A. I have a moral conscience given to me by 24 God telling me that I do not need a vaccine because</p>	<p style="text-align: center;">Page 16</p> <p>1 I have natural antibodies.</p> <p>2 BY MS. RICCHIUTO:</p> <p>3 Q. Okay. Then if we move on to paragraph 4 197, there is a reference to some extra 5 requirements applied to you. Do you see that 6 reference, Daniel?</p> <p>7 A. I see that, yes.</p> <p>8 Q. Do you have an understanding of what 9 extra requirements are being referenced in that 10 paragraph?</p> <p>11 A. I do.</p> <p>12 Q. Okay. And what are those?</p> <p>13 A. Wearing a mask at all times on IU 14 property and being tested for COVID two times a 15 week.</p> <p>16 Q. Okay. And it says that you also have a 17 sincerely held religious objection to those two 18 requirements. Is that accurate?</p> <p>19 A. That is correct.</p> <p>20 Q. Is that religious objection the same as 21 the one that you just identified or is it something 22 different?</p> <p>23 MS. SIEBERT: Anne, I'm going to object again 24 to that line of questioning because of the same</p>

<p style="text-align: center;">Page 17</p> <p>1 constitutional basis.</p> <p>2 Daniel, you may answer.</p> <p>3 BY THE WITNESS:</p> <p>4 A. It is the same.</p> <p>5 BY MS. RICCHIUTO:</p> <p>6 Q. Okay. Do you attend any kind of house</p> <p>7 of worship, Daniel?</p> <p>8 A. Yes.</p> <p>9 MS. SIEBERT: Again, Anne, I'm going to object</p> <p>10 to this specific line of questioning.</p> <p>11 Daniel, you may answer this -- this</p> <p>12 question.</p> <p>13 BY MS. RICCHIUTO:</p> <p>14 Q. And I'm just looking for, if it helps,</p> <p>15 I'm just looking for a yes or a no. I don't need</p> <p>16 to know what it is or what religion it is.</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Did you visit that -- that</p> <p>19 physical location in person during 2020 at all?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. About how many times?</p> <p>22 A. I don't know.</p> <p>23 Q. Was it closer to monthly, closer to</p> <p>24 weekly, closer to daily?</p>	<p style="text-align: center;">Page 18</p> <p>1 A. Monthly.</p> <p>2 Q. Was there ever a time that that house of</p> <p>3 worship required masking since the pandemic started</p> <p>4 in March of 2020?</p> <p>5 MS. SIEBERT: Anne, I'm going to object to</p> <p>6 this line of questioning again, first, on</p> <p>7 constitutional basis and, secondly, because</p> <p>8 whatever his house of worship requires has nothing</p> <p>9 to do with what IU may or may not require.</p> <p>10 Daniel, I'll let you go ahead and answer</p> <p>11 this question. But I would state that too many</p> <p>12 more questions about his specific religious</p> <p>13 practices will not be answered.</p> <p>14 BY MS. RICCHIUTO:</p> <p>15 Q. And, again, I'm not asking a question</p> <p>16 about your religious practices, Daniel. I'm just</p> <p>17 asking if the physical location where you exercise</p> <p>18 your religion, whether they had any masking</p> <p>19 requirements since March of 2020.</p> <p>20 A. Yes.</p> <p>21 Q. Do you -- do you have any idea when</p> <p>22 those were implemented?</p> <p>23 A. I don't know.</p> <p>24 Q. Do you have any idea if those are still</p>
<p style="text-align: center;">Page 19</p> <p>1 in place today?</p> <p>2 A. I don't know.</p> <p>3 Q. Okay. Were there times that you</p> <p>4 physically attended this location and wore a mask?</p> <p>5 A. Yes.</p> <p>6 Q. Were there other times since March of</p> <p>7 2020, without regard to your house of worship or</p> <p>8 other places that you might exercise your religion,</p> <p>9 that you have worn a mask specifically related, you</p> <p>10 know, not Halloween, but specifically related to</p> <p>11 the COVID-19 pandemic?</p> <p>12 A. There were times I didn't have to.</p> <p>13 Q. Okay. I'm trying to understand your</p> <p>14 mask wearing practices and experiences since</p> <p>15 March of 2020.</p> <p>16 Like, for example, my parents live in</p> <p>17 Illinois. I know the orders there have been pretty</p> <p>18 stringent.</p> <p>19 Have there been times since March of</p> <p>20 2020 that you have worn a mask at any location?</p> <p>21 A. Yes.</p> <p>22 Q. Can you give me some examples of places</p> <p>23 that you have worn masks?</p> <p>24 A. In school, at stores, two main examples.</p>	<p style="text-align: center;">Page 20</p> <p>1 Q. Have you, for example, flown on an</p> <p>2 airplane?</p> <p>3 A. Yes, I have.</p> <p>4 Q. Did you have to wear a mask to do that?</p> <p>5 A. Yes, I did.</p> <p>6 Q. Okay. Do you attend a public school or</p> <p>7 private school for high school? Did you I guess I</p> <p>8 should say.</p> <p>9 A. Private.</p> <p>10 Q. Private. Okay. And were you required</p> <p>11 to wear a mask at all times while you were at</p> <p>12 school?</p> <p>13 A. They had a rule, yes.</p> <p>14 Q. And did you comply with it?</p> <p>15 A. I did.</p> <p>16 Q. Okay. So, stores, schools. So, schools</p> <p>17 every day or were you on hybrid?</p> <p>18 A. We were hybrid for the first semester.</p> <p>19 Q. Okay. So, if I were trying to get a</p> <p>20 sense of how often since March of 2020 you have</p> <p>21 worn a mask, how would you help me identify that?</p> <p>22 Is it every time you left the house, something</p> <p>23 else?</p> <p>24 A. It was not every time I left the house,</p>

Page 21	Page 22
<p>1 no.</p> <p>2 Q. Is it -- sorry. Go ahead.</p> <p>3 A. In school they required masks around</p> <p>4 once a week. The stores required masks. That was</p> <p>5 basically it.</p> <p>6 Q. So, schools, stores and your place of</p> <p>7 worship are all places that you wore masks or have</p> <p>8 worn masks since March of 2020. Does that sum up</p> <p>9 your testimony?</p> <p>10 A. That is correct.</p> <p>11 Q. Okay. Anywhere else that you can think</p> <p>12 of that you have worn a mask to protect yourself or</p> <p>13 others from COVID-19 since 2020?</p> <p>14 A. Nothing primarily, no.</p> <p>15 Q. Okay. You -- the Complaint says, if we</p> <p>16 turn back to the -- to the document, paragraph 198,</p> <p>17 Daniel, which is on the next page there, it says,</p> <p>18 "Mr. D.J.B.," that's you, "recently had a COVID</p> <p>19 antibody test which revealed that he still has</p> <p>20 antibodies."</p> <p>21 Do you see that?</p> <p>22 A. I do, yes.</p> <p>23 Q. I want to ask you about that. When was</p> <p>24 that recent COVID antibody test?</p>	<p>1 A. It was in the beginning of June.</p> <p>2 Q. Okay. What was the result of that test?</p> <p>3 A. The result showed that I still had COVID</p> <p>4 antibodies.</p> <p>5 Q. And when you say "still," tell me what</p> <p>6 you mean by that.</p> <p>7 A. That my body successfully fought off</p> <p>8 COVID and I have the antibodies.</p> <p>9 Q. Was there another time before the</p> <p>10 beginning of June that you had a COVID antibody</p> <p>11 test?</p> <p>12 A. There was not, no.</p> <p>13 Q. Okay. Your early June COVID antibody</p> <p>14 test, did it tell you what level of antibodies you</p> <p>15 have?</p> <p>16 A. I'm not sure, no.</p> <p>17 Q. Do you have any understanding of what</p> <p>18 level of antibodies you need to be immune from</p> <p>19 COVID?</p> <p>20 A. I don't know.</p> <p>21 Q. Do you have any understanding of how</p> <p>22 long COVID antibodies last in the human body?</p> <p>23 A. I don't know.</p> <p>24 Q. Do you have any religious objections to</p>
Page 23	Page 24
<p>1 COVID antibody tests?</p> <p>2 A. I do not.</p> <p>3 Q. What was the reason that you got an</p> <p>4 antibody test in early June?</p> <p>5 A. To see if I had the natural antibodies</p> <p>6 for COVID.</p> <p>7 Q. Was it just something you were curious</p> <p>8 about or was there a reason that you were</p> <p>9 interested in that information?</p> <p>10 A. My mother wanted to see if I had natural</p> <p>11 antibodies for COVID.</p> <p>12 Q. And I assume you got that test at some</p> <p>13 sort of medical facility, is that right?</p> <p>14 A. That is correct.</p> <p>15 Q. And then as a result of that test, the</p> <p>16 Complaint says that you filed a medical exemption</p> <p>17 at IU, which is a separate exemption from the --</p> <p>18 from the religious exemption. Is that right?</p> <p>19 A. Yes, that is correct.</p> <p>20 Q. Okay. And that exemption was not</p> <p>21 granted the Complaint says, is that right?</p> <p>22 A. That is correct.</p> <p>23 Q. Okay. What is the basis of your</p> <p>24 understanding that you do not need to be vaccinated</p>	<p>1 if you have antibodies?</p> <p>2 A. I have a moral conscience that has been</p> <p>3 given to me by God telling me that I do not need</p> <p>4 the vaccination.</p> <p>5 Q. Okay. I just want to make sure that I</p> <p>6 understand that answer. Does that answer depend</p> <p>7 upon whether or not you have antibodies, Daniel?</p> <p>8 A. I'm not sure what you're asking.</p> <p>9 Q. Okay. That was not a very good</p> <p>10 question. So, I'm glad you said that.</p> <p>11 Earlier we talked about -- I think I got</p> <p>12 a similar answer to the question about just kind of</p> <p>13 generally what your objection was to receiving the</p> <p>14 vaccine, and now I'm trying to understand what your</p> <p>15 understanding is of why you wouldn't need to be</p> <p>16 vaccinated if you have antibodies.</p> <p>17 A. I believe that I do not need the COVID</p> <p>18 vaccine because my moral conscience tells me that I</p> <p>19 have the antibodies and I do not require the</p> <p>20 vaccine.</p> <p>21 Q. Okay. Is there anything else besides</p> <p>22 your moral conscience that your understanding that</p> <p>23 you don't need the vaccine is based on?</p> <p>24 A. Can you please rephrase your question.</p>

1 Q. Sure. Let's take a look at your
 2 Complaint. And it says in 200 -- I just want to
 3 make sure that you -- that I'm doing a better job
 4 with my questions.

5 In paragraph 200 it said, the second
 6 sentence says, "He objects to these extra
 7 requirements as they are not necessary since he
 8 already has natural antibodies."

9 Do you see that?

10 A. I do, yes.

11 Q. And that's what I'm trying to
 12 understand. What is the basis for that
 13 understanding, that masking and testing are not
 14 necessary because you have natural antibodies?

15 A. I believe that I do not need the COVID
 16 vaccine or to wear a mask or to be tested because I
 17 have natural antibodies and according to my moral
 18 conscience tells me I don't need them because of
 19 that.

20 Q. Has a physician told you that you don't
 21 need or any medical professional told you that you
 22 don't need to mask or be tested because of your
 23 antibodies?

24 A. No medical professional has directly

1 told me that, no.

2 Q. Has any medical professional told you
 3 that you would not benefit from receiving the COVID
 4 vaccine because of your antibodies?

5 A. No one has told me that, no.

6 Q. Okay. Have you had COVID in the past,
 7 Daniel?

8 A. Yes, I have.

9 Q. Do you know how many times?

10 A. I've had it one time.

11 Q. When was that?

12 A. I'm -- I don't know.

13 Q. Was it in 2020 or 2021?

14 A. 2020.

15 Q. How did you know that you had it?

16 A. Because it showed up on the antibody
 17 test.

18 Q. Okay. So, you just learned in June of
 19 2021 that you had had COVID in 2020. Is that -- do
 20 I understand your testimony right?

21 A. That is correct.

22 Q. Did you have any -- have you ever had a
 23 COVID test?

24 A. I have not, no.

1 Q. Did you know that you had COVID at the
 2 time that you apparently had COVID?

3 A. I believed I did.

4 Q. Okay. So, tell me if I'm -- if I'm
 5 getting this right. I don't want to put words in
 6 your mouth.

7 Was there a time in 2020 that you
 8 thought you might have had COVID but you just
 9 didn't get tested to confirm that?

10 A. That is correct.

11 Q. Okay. Were you experiencing symptoms
 12 that have been known to be associated with COVID?

13 A. Yes, I was.

14 Q. Okay. And that was sometime in 2020?

15 A. Correct.

16 Q. So, without knowing at the time whether
 17 you actually had COVID, we get to June of 2021, and
 18 I think you said your mom wondered if you had
 19 antibodies, is that right?

20 A. That is correct.

21 Q. Do you know why she was interested in
 22 whether you had antibodies in June of 2021?

23 MS. SIEBERT: It looks like they might have
 24 frozen up, Anne.

1 MS. RICCHIUTO: I think you might be right.
 2 (WHEREUPON, there was a short
 3 interruption.)

4 THE REPORTER: Back on the record.

5 MS. RICCHIUTO: Thank you.

6 BY MS. RICCHIUTO:

7 Q. Do you know why your mom was interested
 8 in June of 2021 in whether you had COVID
 9 antibodies?

10 A. To file for a medical exemption from the
 11 COVID.

12 Q. Okay. From the requirement at IU?

13 A. Yes, that's correct.

14 Q. Okay. Going back to when you believed
 15 that you may have had COVID in 2020. What were
 16 your symptoms?

17 A. Coughing, a high temperature fever, loss
 18 of taste, loss of taste and smell.

19 Q. Is that it?

20 A. That was it, yes.

21 Q. For how long were you sick?

22 A. Two days.

23 Q. Did you need any medical care?

24 A. I did not, no.

<p style="text-align: center;">Page 29</p> <p>1 Q. Did you miss school? 2 A. I was hybrid for those days. 3 Q. Was there a reason why if you had COVID 4 symptoms why you didn't get tested at the time? 5 A. I did not believe I needed to get 6 tested. 7 Q. Why not? 8 A. Because I believed that I had the COVID. 9 Q. Okay. So, you felt certain that you had 10 it and didn't think it was necessary to confirm 11 that with a test. Is that fair? 12 A. That is correct. 13 Q. On these days that you had symptoms, 14 were you living in a -- in a residence with other 15 people? 16 A. I was, yes. 17 Q. Did you wear a mask at that time? 18 A. I did not, no. 19 Q. Did anybody else in the residence wear a 20 mask on the days that you had COVID symptoms? 21 A. They did not, no. 22 Q. Why did you not wear a mask on the days 23 that you had COVID symptoms? 24 A. I felt it would be ineffective.</p>	<p style="text-align: center;">Page 30</p> <p>1 Q. Ineffective in what way? 2 A. From spreading it. 3 Q. Okay. So, you have -- do I understand 4 that it's your belief that masks are not effective 5 in preventing the spread of COVID? 6 A. That is correct. 7 Q. Okay. In paragraph 200 of the 8 Complaint, Daniel, which is where we were, it says 9 that you object generally to the extra 10 requirements, which we said were masks and testing 11 I think you said. 12 And then that last sentence says, you 13 object "given their unreasonableness and the 14 extremely minimal risk of COVID to those in his age 15 group." And I just want to ask you a few questions 16 about that. 17 What do you consider to be your age 18 group? 19 A. Young adults and teenagers. 20 Q. What is your understanding -- this says 21 that there's an extremely minimal risk of COVID to 22 those in your age group. What's your understanding 23 of the risk of COVID to those in your age group? 24 A. That I am highly likely to recover from</p>
<p style="text-align: center;">Page 31</p> <p>1 COVID. 2 Q. Okay. So, it's not that you're not 3 likely to get COVID, correct? 4 A. Correct. 5 Q. Is there something that you're -- that 6 you're looking at or reading from, Daniel, when 7 you're answering my questions? 8 A. I'm looking at the document that was 9 shared. 10 Q. Okay. So, just to make sure that I 11 understand, this sentence about extremely minimal 12 risk of COVID to those in your age group, it's not 13 a belief that people in your age group are not at 14 risk to contract COVID. Is that correct? 15 Let me ask it a different way. 16 A. I'm not sure. 17 Q. That's probably too backwards. Let me 18 ask it a different way. 19 Do you agree that people in your age 20 group can and do contract COVID? 21 A. I do. 22 Q. And you yourself contracted COVID, 23 right? 24 A. That is correct.</p>	<p style="text-align: center;">Page 32</p> <p>1 Q. Okay. So, I just want to make sure that 2 I understand what it is that's the minimal risk, 3 and what I think your testimony was is that the 4 minimal risk is that you are likely to recover if 5 you do get it. Is that accurate? 6 A. That is accurate. 7 Q. Okay. Is there anything that you want 8 to -- is there any way that you want to say that 9 differently than the way that I've kind of restated 10 your testimony? 11 A. I do not, no. 12 Q. Okay. When you had COVID and were 13 living with others, was that your folks? 14 A. Yes, it was. 15 Q. Okay. Did either of them develop COVID 16 symptoms, either before or after you had your COVID 17 symptoms? 18 A. Not after, no. 19 Q. Okay. Did one or both of your parents 20 have COVID symptoms before you had yours? 21 A. My father. 22 Q. Okay. Do you know if your father had a 23 COVID test when he had symptoms? 24 A. I'm not sure.</p>

<p style="text-align: center;">Page 33</p> <p>1 Q. Did anyone in the house wear masks while 2 your father was experiencing his COVID symptoms? 3 A. No one wore masks, no. 4 Q. Do you know if you got COVID from your 5 father or from some other source? 6 A. I'm not sure who I got it from, no. 7 Q. Okay. You weren't part of like some 8 kind of contact tracing effort where someone 9 contacted you and said, "This kid you sit next to 10 in school has it," or something like that, is that 11 right? 12 A. That is correct. 13 Q. Do you have any reason to think that you 14 could have gotten COVID from someone other than 15 your dad? 16 A. I'm not sure now. 17 Q. With respect to the minimal risk of 18 COVID to those in your age group, do you -- I think 19 we said you agree that you can get COVID. Do you 20 agree that people in your age group can spread 21 COVID to others? 22 A. I agree with that. 23 Q. Okay. Can you explain to me 24 specifically how you are harmed by -- how you will</p>	<p style="text-align: center;">Page 34</p> <p>1 be harmed by wearing a mask on campus in 2 Bloomington this fall? 3 A. I will feel discriminated against and 4 peer-pressured to get the vaccine. 5 Q. Okay. Where did those -- those are things -- it sounds to me like those are things 6 that you are thinking might happen in the future, 7 right, that you will feel discriminated against and 8 peer-pressured. 10 Are those things that have happened to 11 you already? 12 A. I felt that way. 13 Q. Were you made to feel that way by 14 Indiana University? 15 A. I'm not sure. 16 Q. Or by other students at IU? 17 You haven't gotten to school yet, right? 18 So, I'm just trying to figure out if 19 these are things that you're worried about might 20 happen or things that have happened to you as a 21 result of your being an incoming student at IU. 22 A. These are things that I am worried about 23 happening. 24 Q. Okay. Any other harm that will result</p>
<p style="text-align: center;">Page 35</p> <p>1 to you if you are required to wear a mask on campus 2 this fall? 3 A. I believe there may be harm. 4 Q. And what would that harm be? 5 A. The mask itself harming my body. 6 Q. Okay. Let's talk about that. 7 What kind of harm are you worried about 8 resulting from wearing a mask? 9 A. Breathing in the fabrics which had been 10 proven to be harmful. 11 Q. Proven by whom? 12 A. The medical professional who spoke in 13 this case prior to this one or prior to today. 14 Q. Okay. I've got to try to figure out who 15 that might be. 16 Have you spoken to a medical 17 professional with respect to this case that told 18 you that breathing in fabrics have proven to be 19 harmful? 20 A. I have not spoken directly, no. 21 Q. Okay. Do you know the name of this 22 person? 23 A. I do not recall his name. 24 Q. Okay. But you think he's associated in</p>	<p style="text-align: center;">Page 36</p> <p>1 some way with this case? 2 A. Yes. 3 Q. Could he be somebody that maybe your 4 lawyers have hired to express some scientific 5 opinions? 6 A. I believe so, yes. 7 Q. Okay. Okay. So, this person says that 8 breathing in fabrics has proven to be harmful. And 9 what is the harm that results from breathing in 10 fabrics, either based on this person or based on 11 your own understanding? 12 A. I do not remember. 13 Q. But as you sit here you're concerned 14 that if you wear a mask in Bloomington this fall 15 you'll be harmed by breathing in the fabrics. Is 16 that accurate or not? 17 A. That is correct. 18 Q. Okay. Did you have that concern in 2020 19 when you wore a mask at school and stores? 20 A. I did, yes. 21 Q. Have you experienced any harm as a 22 result of wearing masks -- wearing a mask to school 23 and stores in 2020? 24 A. I have not yet.</p>

1 Q. Okay. That was -- that was -- talk
 2 about how masking might harm you. What is the harm
 3 that you will experience, if any, from being tested
 4 for COVID while you're at school at Bloomington?

5 A. Can you rephrase your question, please.

6 Q. Sure. One of the -- one of the things
 7 that is at issue in this case is how or whether you
 8 and the other Plaintiffs will be harmed if you are
 9 required to wear a mask and undergo COVID testing
 10 while you are at school this fall.

11 And, so, I want to -- I want to
 12 understand what is the harm that you expect or
 13 anticipate or are concerned about resulting
 14 specifically from being COVID tested this fall at
 15 Bloomington.

16 A. I'm not sure how to answer that.

17 Q. Okay. Well, let me start with something
 18 easier.

19 Do you believe that you will be harmed
 20 by being COVID tested in Bloomington this fall?

21 A. I do.

22 Q. Okay. In what way will you be harmed?

23 A. The chemicals of the cotton swab.

24 Q. Okay. Tell me more about that. Is this

1 the cotton swab that would be used to conduct the
 2 testing?

3 A. Yes.

4 Q. Okay. And tell me about the chemicals
 5 of the cotton swab.

6 A. I don't know.

7 Q. Okay. Where does the -- where does your
 8 understanding come from that there could be
 9 chemicals on the cotton swab that would harm you if
 10 you were COVID tested?

11 A. The medical professional who spoke in
 12 this case earlier.

13 Q. Okay. Is this the same professional who
 14 gave you the information about the fabrics?

15 A. Yes.

16 Q. Okay. Is he somebody that you've spoke
 17 to live or got to see speak or is this something
 18 that you've seen that he wrote down?

19 A. Seen what he wrote down.

20 Q. Have you ever talked to him?

21 A. I have not.

22 Q. Okay. Have you ever talked to any
 23 medical professional about either the fabric, the
 24 breathing in the fabrics harm or the chemical

1 cotton swab harm?

2 A. I have not spoken to a medical
 3 professional about those.

4 Q. So, when is -- when did you see this
 5 document that identified the chemical issue and the
 6 fabric issue?

7 A. I saw the document yesterday.

8 Q. Okay. So, that was after this lawsuit
 9 was filed, is that right?

10 A. That is correct.

11 Q. Okay. And before you saw that document,
 12 did you have any understanding of any harm that you
 13 could experience or would experience if you wore a
 14 mask on campus?

15 A. I believed that before, yes.

16 Q. Believed what before?

17 A. That masks and the fabrics in them could
 18 cause bodily harm before seeing the document.

19 Q. Did you have a concern about the
 20 chemicals on cotton swabs before yesterday?

21 A. Yes.

22 Q. And where did that concern come from?
 23 When's the first time you had that concern?

24 A. I'm not sure.

1 Q. Was it in 2020?

2 A. No.

3 Q. Do you know if it was before this
 4 lawsuit was filed?

5 A. It was not.

6 Q. Okay. So, sometime after the lawsuit
 7 was filed you became concerned that chemicals in a
 8 cotton swab could harm you if you're tested for
 9 COVID. Is that accurate?

10 A. That is correct.

11 Q. Okay. When are you scheduled to move to
 12 campus?

13 A. I'm not sure. I believe it is the week
 14 before classes start.

15 Q. I think that -- I think that's like the
 16 early 20s. Does that sound right to you?

17 A. Sounds right, yeah.

18 Q. Okay. Does your move to Bloomington
 19 depend upon whether an injunction is granted in
 20 this case?

21 A. I'm not sure yet.

22 Q. What will that depend on?

23 A. The mask restrictions and the testing.

24 Q. Okay. So, you know you're exempt from

1 the vaccine, right? So you won't -- you're free to
 2 move to Bloomington without the vaccine. Is that
 3 your understanding?

4 A. Yes.

5 Q. Okay. But if the -- if the Court
 6 determines that it is appropriate for you to wear a
 7 mask and undergo testing, is it your intention that
 8 you will or won't move to Bloomington as scheduled
 9 in August?

10 A. I have not decided yet.

11 Q. Okay. And what will that decision be
 12 based on?

13 A. My moral conscience.

14 Q. Who will make that decision about
 15 whether you go to Bloomington in August?

16 A. Myself.

17 Q. If you -- do you have any plans to get
 18 another antibody test, Daniel?

19 A. Not as of now.

20 Q. If you were to get an antibody test in
 21 the future and it reflected that you either no
 22 longer had antibodies or a medical professional
 23 told you that your antibodies were low enough that
 24 they weren't, you know, clinically effective with

1 respect to COVID, would any of the views that we've
 2 talked about in your deposition today, would any of
 3 those views change?

4 A. No.

5 Q. So, regardless of whether or not you
 6 have antibodies, you have a religious and practical
 7 objection to masking. Is that fair?

8 A. That is correct.

9 Q. And regardless of whether or not you
 10 have antibodies, you have a religious and/or
 11 practical -- I mean, you tell me -- objection to
 12 testing. I just want to make sure I understand
 13 your views.

14 A. That is correct, yes.

15 Q. Okay. In terms of -- in terms of this
 16 lawsuit, do you know any of the other Plaintiffs?

17 A. I do not, no.

18 Q. Have you had any communication with
 19 them?

20 A. There was a prep virtual call yesterday
 21 with them in there.

22 Q. Was that to talk about the depositions?

23 A. That is correct, yes.

24 Q. Okay. With your lawyers?

1 A. Yes.

2 Q. Okay. And I don't -- I'm not allowed to
 3 ask and I don't want to know what your lawyers
 4 talked to you about. I'm going to hope that it --
 5 that the experience wasn't as bad as maybe they
 6 would have led you to believe that it could be.
 7 But you don't have to answer. That's not a real
 8 question.

9 Other than the meeting that you had with
 10 your lawyers and the other Plaintiffs to prepare
 11 for the deposition, do you -- you said you have had
 12 no contact with the other Plaintiffs, is that
 13 right?

14 A. I've had no contact, correct.

15 Q. Okay. Your antibody test, is that a
 16 blood test?

17 A. It was a blood test, correct.

18 Q. Okay. And do you have any kind of
 19 religious objection to blood testing?

20 A. I do not.

21 Q. Do you have religious objections to any
 22 other medical procedures?

23 A. I do not.

24 Q. Have you -- I've got two little boys. I

1 don't know if you're an accident-prone person.

2 Are you a kid who needed like stitches
 3 or who had broken bones a lot when you were growing
 4 up?

5 A. I was not, no.

6 Q. Okay. Have you ever had to go to the
 7 hospital?

8 A. A few times.

9 Q. Okay. And has there ever been -- and I
 10 don't need to know what it is. But has there ever
 11 been a treatment that's been offered to you
 12 medically that you have refused based on a
 13 religious objection?

14 A. I don't think so.

15 Q. Okay.

16 MS. RICCHIUTO: Melena, do you have any
 17 questions that you want to ask your witness on the
 18 record?

19 MS. SIEBERT: I just had actually just a
 20 couple.

21 MS. RICCHIUTO: Okay. I'll pass the witness
 22 for now. Okay.

23 MS. SIEBERT: I'm sorry. I missed that last
 24 part, Anne.

1 MS. RICCHIUTO: I just said I will pass the
2 witness for now, then.

3 MS. SIEBERT: Okay, great.
4 EXAMINATION

5 BY MS. SIEBERT:

6 Q. Actually, Daniel, I think I just have
7 one question.

8 Earlier Anne had asked you if you
9 thought that everything in the Complaint was
10 correct. Do you remember that?

11 A. Yes.

12 Q. Okay. And you, to my recollection,
13 answered that you thought everything was correct?

14 A. Yes.

15 Q. Okay. I want to just clarify, were
16 you -- when you answered that question, were you
17 thinking about the specific allegations that might
18 relate to the other Plaintiffs' specific situations
19 or were you thinking more generally about the
20 Complaint?

21 A. I was thinking more generally.

22 Q. Okay. Do you have any basis of personal
23 knowledge for whether the allegations that
24 specifically relate to the other Plaintiffs are

1 correct or not?

2 A. I'm not sure.

3 Q. Okay. Let me -- probably a bad
4 question.

5 Do you have any personal knowledge about
6 the background, either medical or religious or
7 personal background, of the other Plaintiffs?

8 A. I do not, no.

9 Q. Okay.

10 MS. SIEBERT: I think that's all I have.

11 MS. RICCHIUTO: Okay. Thank you. Thank you,
12 Daniel. Thank you to Mr. and Mrs. Baumgartner for
13 letting us talk to your son tonight. That's all
14 the questions that I have.

15 Melena, I don't know if you want to read
16 and sign or anything. I'll let you.

17 MS. SIEBERT: Read and sign would be great.

18 And I don't know exactly how the process
19 will be with roughs and the final and things like
20 that that come through, but we'll comply with
21 whatever timing needs to happen there.

22 MS. RICCHIUTO: Okay. And then the last thing
23 I just want to make sure that we have on the record
24 is the request for the notes that Daniel was

1 working from during his testimony.

2 MS. SIEBERT: Yes. Of course. He'll give
3 those to us. We'll review of course for any
4 privileged information. But then, yes, we will
5 send those along.

6 MS. RICCHIUTO: Okay.

7 (Time Noted: 4:58 p.m.)

8 FURTHER DEPONENT SAITH NAUGHT.

1 I, CORINNE T. MARUT, C.S.R. No. 84-1968,
2 Registered Professional Reporter and Certified
3 Shorthand Reporter, do hereby certify:

4 That previous to the commencement of the
examination of the witness, the witness was duly
sworn to testify the whole truth concerning the
matters herein;

5 That the foregoing deposition transcript
was reported stenographically by me, was thereafter
reduced to typewriting under my personal direction
and constitutes a true record of the testimony
given and the proceedings had;

6 That the said deposition was taken
before me at the time and place specified;

7 That the reading and signing by the
witness of the deposition transcript was agreed
upon as stated herein;

8 That I am not a relative or employee or
attorney or counsel, nor a relative or employee of
such attorney or counsel for any of the parties
hereto, nor interested directly or indirectly in
the outcome of this action.

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14 CORINNE T. MARUT, Certified Reporter

15
16 (The foregoing certification of this
transcript does not apply to any
17 reproduction of the same by any means, unless under
the direct control and/or supervision of the
certifying reporter.)

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Page 49

1 INSTRUCTIONS TO WITNESS
23 Please read your deposition over
4 carefully and make any necessary corrections. You
5 should state the reason in the appropriate space on
6 the errata sheet for any corrections that are made.7 After doing so, please sign the errata
8 sheet and date it.9 You are signing same subject to the
10 changes you have noted on the errata sheet, which
11 will be attached to your deposition.12 It is imperative that you return the
13 original errata sheet to the deposing attorney
14 within thirty (30) days of receipt of the
15 deposition transcript by you. If you fail to do
16 so, the deposition transcript may be deemed to be
17 accurate and may be used in court.

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Page 50

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2 ERRATA
34 PAGE LINE CHANGE
56 REASON: _____
78 REASON: _____
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1 ACKNOWLEDGMENT OF DEONENT
23
4 I, D.J.B., do hereby certify under
5 oath that I have read the foregoing pages, and that
6 the same is a correct transcription of the answers
7 given by me to the questions therein propounded,
8 except for the corrections or changes in form or
9 substance, if any, noted in the attached Errata
10 Sheet.

11

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13

14 D.J.B. DATE

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16

17 Subscribed and sworn
18 to before me this
19 ____ day of _____, 20____.
20 My commission expires: _____21 _____
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